

I am impressed with the efforts of the EPA in establishing limits in their TMDL goals.

I do feel, though, that , due to a lack of attention being paid to assisting small communities with the task of creating sewage treatment facilities, these goals are unlikely to be met.

In Moorefield WV,, for example, the EPA approved plans to build a sewage treatment plant that is four miles north of the sewage production area (when other closer sites were available). They approved a site which is next to the river for which open vats were planned (open vats permit overflow in heavy rains to say nothing of stench) ; composting adjacent to the vats in flood zone was apparently also approved. This same site will require digging under the river which is likely to cause a “sink trap” like effect with its attendant maintainance expenses. The EPA approved the site despite the fact that the highway department was denied use of the same land due to its being a historic battlefield and Indian Burial Ground. The EPA went against the WV Dept. of Culture and History in approving the site.

Moorefield has had to fire two sets of engineers—after paying them. The first group submitted a plan which was ultimately critiqued by another engineer and shown to produce a minimal 14% loss of raw sewage. The next group designed the open lagoon system next to the river. They went over the charges anticipated, and were fired . Now we do not have the design engineers directing the project.

My concern is that—with the EPA’s help—we are likely to build a plant which will not meet the TMDL restrictions, and will add to the pollution due to occasional overflow and composting in a flood plane, with the added “attraction” of being extremely high maintenance—all for the projected fee of \$37 million.

The EPA is fulfilling half the job by setting the goals. We need more effective assistance in directing communities to make the appropriate choices of engineering talent , plant sites, etc., if we are to be effective in implementing those goals. Our experience has shown that leaving it to inexperienced local town councils to make these decisions alone is a good way to waste public grant money.